

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUG 26 1994

Robert J. Taborn, Treasurer Thompson, Bine and Flory National Good Government Fund 1100 National City Bank Building Cleveland, OH 44114

Identification Number: C00163196

Reference: July Quarterly Report (4/1/94-6/30/94)

Dear Mr. Taborn:

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This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-For your information, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii). Contributions received aggregating over \$200 per individual for the calendar year should be reported on Line 11(a)(i) and itemized on Schedule A.

-Your report discloses no payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and Any such payments to a person aggregating in supplies. excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. \$434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. \$433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, outstanding for sixty days or more. 11 CFR \$104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. \$434(b)(3) and 11 CFR \$104.13, and the limitations and prohibitions of 2 U.S.C. \$5441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle heginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Neil Evans

Reports Analyst

Reports Analysis Division

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